

EXHIBIT A

From: Michael Bloch
Sent: Sunday, May 3, 2020 11:39 PM
To: dcampbell@dhdgclaw.com; bryan@bjoneslegal.com; jek318@gmail.com; dinuuccilaw@outlook.com; rebroomlaw@gmail.com; matthew.w.heimbach@gmail.com; dillon_hopper@protonmail.com; deplorabletruth@gmail.com; eli.f.mosley@gmail.com; christopher.cantwell@gmail.com; azzmador@gmail.com
Cc: Jessica Phillips <jphillips@bsfllp.com>; Levine, Alan <alevine@cooley.com>
Subject: RE: Sines v. Kessler

All,

We are hoping to schedule a call this week to discuss scheduling depositions. I would propose Wednesday, May 3 at 1:00 pm. Please let me know as soon as possible if that time works for you. Thanks.

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From: Michael Bloch
Sent: Friday, April 3, 2020 10:23 PM
To: dcampbell@dhdgclaw.com; bryan@bjoneslegal.com; jek318@gmail.com; dinuuccilaw@outlook.com; rebroomlaw@gmail.com; matthew.w.heimbach@gmail.com; dillon_hopper@protonmail.com; deplorabletruth@gmail.com; eli.f.mosley@gmail.com; christopher.cantwell@gmail.com; azzmador@gmail.com; Jessica Phillips <jphillips@bsfllp.com>; Roberta Kaplan <rkaplan@kaplanhecker.com>; kdunn@BSFLLP.com; Julie Fink <jfink@kaplanhecker.com>; Gabrielle E. Tenzer <gtenzer@kaplanhecker.com>; Levine, Alan <alevine@cooley.com>; dmills@cooley.com
Subject: Sines v. Kessler

All,

Thank you for the call today.

I am writing to memorialize the points of agreement we reached on today's call. All are in agreement to work toward maintaining our current trial date of October 26, 2020 and all interim deadlines. To that end:

1. The parties agree to participate in video depositions, if necessary.
 - a. The parties agree to consent to court reporters, attorneys, and parties being in separate locations over the course of a video deposition. The parties agree to confirm this on the record.
2. The parties agree that incarcerated parties and witnesses may be deposed after the July 17, 2020 deadline, if necessary.
3. The parties agree that any third-party witnesses who either side is unable to subpoena during the discovery period (after making a good-faith effort to do so) may be deposed after the July 17, 2020 deadline.
4. The parties agree that Plaintiffs (collectively) and Defendants (collectively) shall each be permitted to depose up to 25 third parties.

Let me know if I have misstated any of the above in any way. For both defense counsel and pro se Defendants, please let us know by **Friday April 10, 2020** if you (pro se Defendants)/your clients (defense counsel) have access to a functioning computer with a video camera and broadband internet connection. We will confirm the same with our clients.

We look forward to speaking again on Monday, April 13, 2020 at 3:00 PM. We'll send around a dial-in for that if you haven't received one already.

Sincerely,

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